

12-4-81

PCB Inspection: M. Watson

Establishment Inspection Report No. 41891

PCB Inspection: Seattle Iron and Metals Corp.
2955 11th Av SW
Seattle, WA 98134. (206) 682-0040

At 1:30 PM, the above facility was inspected for PCBs under the authority of the Toxic Substances Control Act. I was involved in this inspection as a trainee, and was accompanied by the Chief Investigator, Environmental Protection Specialist Athena Lalikos from the Idaho Operations Office. We presented our credentials, Notice of Inspection, and Notice of Confidentiality to Mr. Irving Sidell, Manager of Operations.

Mr. Sidell then invited us to his office, where we discussed the ACT and our reasons for performing this routine inspection. Mr. Sidell initially referred to PCBs as "PVCs", and related that the company did indeed receive transformers from both Puget Power and City Light. The transformers were then pumped out to remove any oils present, and their copper cores were salvaged. He was quite sure that both Puget Power and City Light were required to somehow certify on paper that the transformers sold to his company were not PCB transformers. Subsequent attempts to locate actual paperwork on his part proved unsuccessful, however. After donning hard hats, we were taken on a very interesting tour of ~~xxx~~ the facility by Mr. Sidell.

We were taken to an area where several dozen transformers of all sizes were stored on pallets in the yard. Two of these were sampled at random for PCBs. The first, sample No. 225152, EPA Lab Code No. 48030, was from a small, older transformer bearing an identification plate from the Line Materials Co., Serial No. 13C2812, 120/140. The second, sample No. 225153, EPA Lab Code No. 48031, was from an older transformer having an identification plate from the General Electric Co. USA, Serial No. 4136833. Both samples were taken by Chief Inspector Lalikos by dipping a 40 ml vial held with surgical gloves into the opened transformer. Both transformers were opened by a Mr. Bruce Sidell, who accompanied us on part of the tour. We then were taken to the waste oil tank. After oil has been pumped out of the transformers to be recycled for their cores, the oil is stored in an approx 500 gallon above-ground tank located on the yard. It is then sent to Petroleum Recycling Co., 1015 S 12th, Tacoma, WA 98405 (206) 383-4474. The tank was only about half full, so it was necessary to use a long wire attached to the 40 ml vial in order to lower it into the tank to collect the sample. The third sample, 40 ml of waste oil, was identified as sample No. 225154, EPA Lab Code No. 48032. Whenever possible, photographs were taken. However the Pentax batteries were left on overnight by the previous user, and this resulted in the batteries running out of power midway through the inspection. I attempted to photograph on manual setting, but doubt of the later photos will be of quality.

We then returned to Mr. Sidell's office. He was very eager to receive some sort of documentation from EPA as to the exact responsibility of utilities (e.g., Puget Power and City Light) which sell the used transformers to his company. As mentioned previously, he seemed under the impression that the utilities had to certify to them that a given transformer was non-PCB before his company would accept it, but no paperwork to this effect was to be found after we had requested that he provide it. Other than the group of transformers sampled and the oil storage tank, no other evidence of possible PCB oils was noted. We thanked Mr. Sidell for his very cordial and cooperative participation in our inspection and departed the site at about 2:55 PM. I told Mr. Sidell that I would try to get him a letter of some sort from James Everts PhD regarding his question about the burden of responsibility in matters involving transformer sales to his company.

Michael Watson Ph.D.
Michael Watson, Ph.D. Toxicologist

ESTABLISHMENT INSPECTION REPORT

1. VISIT NO.

41892

2. REGION NO. 10		3. INSPECTOR NO. 1605		4. DATE OF VISIT 12-4-81		5. ESTAB. REGISTRATION NO. PCB		
6. ESTABLISHMENT NAME AND ADDRESS (Including Street, city, state, ZIP code, county and phone number) Seattle Iron and Metals Corp. 2955 11th Avenue SW Seattle, WA 98134				7. RELATED FIRMS None				
8. TYPE OF ESTABLISHMENT Metals Recovery		9. TYPE OF OWNERSHIP Individual		10a. TOTAL ANNUAL SALES -----		10b. PERCENT PESTICIDES -----		
11. NAMES AND TITLES OF OF PRINCIPAL OFFICERS, PARTNERS OR OWNERS Irving Sidell Manager, Operations (206) 682-0040								
12. PERSONS INTERVIEWED (Give name, title, phone number and responsibility) Irving Sidell Manager, Operations (206) 682-0040								
13a. PHYSICAL SAMPLES COLLECTED				13b. DOCUMENTARY SAMPLES		13c. LABELS REVIEWED WITHOUT SAMPLES		
EPA REGISTRATION NO.		SAMPLE NO.		EPA REGISTRATION NO.		SAMPLE NO.		EPA REGISTRATION NO.
Transformer Oil, Line Material Co. Ser. No. 13C2812 120/240		225152 EPA LAB		CODE NUMBER 48030				
Transformer Oil, G.E., USA Ser. No. 4136833		225153 EPA LAB		CODE NUMBER 48031				
Waste Oil Sample From Tank		225154 EPA LAB		CODE NUMBER 48032				
14. REMARKS Inspection conducted as training for M.W., in conjunction with Athena Lalikos. Presented credentials, Notice of Inspection, Notice of Confidentiality, Receipt For Samples. Photos and 3 samples obtained. Laboratory Analysis Code Number assigned is noted above Company contends that it receives transformers only from Puget Power or City Light, and that these industries have assured them that the transformers are not PCB transformers. Waste Oil is sent to Petroleum Recycling, 1015 S 12th, Tacoma 98405 (206) 383-4474								
15. SIGNATURE OF INSPECTOR <i>Michael Winston Ph.D.</i>				16. INSPECTOR'S STATION Seattle, WA				

ESTABLISHMENT INSPECTION REPORT

1. V. NO. 41892

2. REGION NO. 10		3. INSPECTOR NO. 1635		4. DATE OF VISIT 12-4-91		5. ESTAB. REGISTRATION NO. PCB	
6. ESTABLISHMENT NAME AND ADDRESS (Including Street, city, state, ZIP code, county and phone number) Seattle Iron and Metals Corp. 2955 11th Avenue SW Seattle, WA 98134				7. RELATED FIRMS None			
8. TYPE OF ESTABLISHMENT Metals Recovery		9. TYPE OF OWNERSHIP Individual		10a. TOTAL ANNUAL SALES		10b. PERCENT PESTICIDES	
11. NAMES AND TITLES OF OF PRINCIPAL OFFICERS, PARTNERS OR OWNERS Irving Sidell Manager, Operations (206) 682-0040							
12. PERSONS INTERVIEWED (Give name, title, phone number and responsibility) Irving Sidell Manager, Operations (206) 682-0040							
13a. PHYSICAL SAMPLES COLLECTED				13b. DOCUMENTARY SAMPLES		13c. LABELS REVIEWED WITHOUT SAMPLES	
EPA REGISTRATION NO.	SAMPLE NO.	EPA REGISTRATION NO.	SAMPLE NO.	EPA REGISTRATION NO.	SAMPLE NO.	EPA REGISTRATION NO.	SAMPLE NO.
Transformer Oil, Fine Material Co. Ser. No. 13C2812	225152 EPA LAB	CODE NUMBER 48030					
Transformer Oil, G.E., USA Ser. No. 4136833	225153 EPA LAB	CODE NUMBER 48031					
Waste Oil Sample From Tank	225154 EPA LAB	CODE NUMBER 48032					
14. REMARKS Inspection conducted as training for M.W., in conjunction with Athena Lallikas. Presented credentials, Notice of Inspection, Notice of Confidentiality, Receipt For Samples. Photos and 3 samples obtained. Laboratory Analysis Code Number assigned is noted above. Company contends that it receives transformers only from Puget Power or City Light, and that these industries have assured them that the transformers are not PCB transformers. Waste Oil is sent to Petroleum Recycling, 1015 S 12th, Tacoma 98405 (206) 383-474							
15. SIGNATURE OF INSPECTOR Michael W. Smith P.D.				16. INSPECTOR'S STATION Seattle, WA			

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101



REPLY TO
ATTN OF:

NOTICE OF INSPECTION UNDER THE TOXIC SUBSTANCES CONTROL ACT
Mail Stop 524

Name of Firm: *SEATTLE IRON & METALS*
Firm Address: *2955 11th SW*
SEATTLE, WA

Date Inspection Commenced:
Hour: *1:40 PM*

Reason for Inspection: *ROUTINE INSPECTION*

☒ For the purpose of inspecting (including taking samples, photographs and other inspection activities) premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with such premises have been complied with.

☒ For the purpose of inspecting (including taking samples, photographs and other inspection activities) conveyances used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with the conveyances have been complied with.

☐ In addition, this inspection extends to (circle appropriate letters):

- A) Financial data
- B) Sales data
- C) Pricing data
- D) Personnel data
- E) Research data

The nature and extent of the data to be inspected as specified in A through E above is as follows:

Name of Person to Whom Notice
of Inspection Was Delivered:

Irving Sedell
Manager

TITLE

Dist: 1 cy Plant Manager
1 cy PCB Violation Coordinator
1 cy Inspector's Files

Signature of EPA Employee:

Merrill Watson Ph.D.

TOXICOLOGIST 11-04-81
TITLE & DATE

Athena H. Lalikow EPS

TSCA Notice of Inspection

Authority to Conduct Inspections

By authority of Section 11 of the Toxic Substances Control Act (15 USC 2601) an authorized representative of the Administrator of the United States Environmental Protection Agency may enter and inspect, at reasonable times, any establishment facility, or other premises in which chemical substances or mixtures are manufactured, processed, stored, or held before or after their distribution in commerce and any conveyance used to transport chemical substances, mixtures, or such articles in connection with distribution in commerce.

Scope of Inspections

Inspections conducted under Section 11 of the Toxic Substances Control Act (15 USC 2601) extend to all things within the premises or conveyance inspected (including records, files, papers, processes, controls, and facilities) bearing upon whether the requirements of the Toxic Substances Control Act applicable to the chemical substances or mixtures within the premises or conveyance have been complied with.

However, inspections shall not extend to the following types of data unless the nature and extent of such data are described with reasonable specificity in the written notice presented to the owner, operator, or agent in charge of the premises or conveyance:

1. financial data
2. sales data (other than shipment data)
3. pricing data
4. research data (other than research data required by the provisions of the Toxic Substances Control Act or under a rule promulgated thereunder)

Penalties for Failure to Allow Inspection

Section 15 of the Toxic Substances Control Act makes it unlawful for any person to fail or refuse to permit entry or inspection as required by Section 11 or to fail or refuse to permit access to or copying of records. Section 16 provides for both civil and criminal penalties for violations of Section 15. Section 17 authorizes specific enforcement, including the obtaining of an injunction to restrain any violations of Section 15.

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101



TSCA INSPECTION CONFIDENTIALITY NOTICE

REPLY TO
ATTN OF: Mail Stop 524

Facility Inspected: SEATTLE IRON & ALUM.

Name of person at the facility
to whom this notice given:

Date Inspected: 11-24-81

Address of Facility: 2755 11th SW
SEATTLE WA

TITLE

Name of chief officer
of business:

DAVID S. BELL, president.

Name of EPA Inspector:

Michael Watson P.D.

Date mailed to chief
officer:

It is possible that EPA will receive public requests for release of data and/or documents obtained by inspectors during inspection of the facility indicated above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552, EPA regulations issued thereunder, 40 CFR Part 2, and the Toxic Substances Control Act Section 14. EPA is required to make documents available in response to FOIA requests unless the Administrator of the agency determines that the data or documents are exempt from disclosure.

Please provide us with a statement specifying any information obtained during our inspection you believe should be exempt from disclosure. This will facilitate the Agency's timely response to any public inquiries, and evaluation of your company's claim of confidentiality.

Your statement should be addressed to: Document Control Officer, Pesticides & Toxic Substances Branch, M/S 524, address above, and should reach this address no later than 30 days after your receipt of this notice. Failure to submit a written request that specified information be characterized as confidential, privileged, or exempt from disclosure within 30 days will be treated by EPA as a waiver of your claims for confidentiality regarding the inspection data. Any non-exempt data may be made available to the public without further notice to you.

Dec 4 1981
date received by owner/operator

Signature of Plant Manager

- Dist: 1 copy Plant Manager
1 copy Chief Officer of Business
1 copy PCB Violation Coordinator
1 copy Inspector's Files

Appendix V

U.S. Environmental Protection Agency

Receipt for Samples

Regional Address:

1200 Sixth Ave
Seattle WA
98101

Name of Plant Manager
or Similar Official:

IRVING SIDELL
MAR. OPERATIONS
Firm Name:

SEATTLE IRON
& METALS CORP.

Firm Address:

2955 11th Ave SW
Seattle 98134

Sample Numbers:

Samples Collected: (Describe fully the time, place, date and type of sample, number of containers for each type of sample)

225152	1 / 40 ml	transf. fluid	Line Math
225153	1 / 40 ml	transf. fluid	ser. 13C2812
225154	1 / 40 ml	Waste oil	G.E. ser 4136833

Acknowledgement of Plant Manager or Similar Official

The undersigned acknowledges that the samples described above have been collected:

Signature:

Irving Sidell

Title:

Duplicate Samples for each Type of Sample Taken:

Sample #

Requested and provided

Not requested

NOT APPLICABLE

Name of person who
collected samples:

Athena K. Lachis

Title of Collector:

Toxicologist

Signature of Collector:

Margaret Harrison Ph.D.

Distribution: one copy to Facility Plant Manager
original to PCB Violation Coordinator
one copy for Inspector's Records